## **Iowa Vocational Rehabilitation Services**

## **Performance Report**

**Performance Results for State Fiscal Year 2013** 

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#### Introduction

This report will present the accomplishments of Iowa Vocational Rehabilitation Services (IVRS), a division of the Iowa Department of Education, for the state fiscal year ending June 30, 2013. Accomplishments include those related to core functions identified in the IVRS SFY 2013 performance plan as well as progress toward goals in the 2011 - 2014 IVRS Strategic Plans. Information in this report is provided in accordance with the Accountable Government Act to improve decision-making and increase accountability to Iowa stakeholders and citizens.

Key services of the agency are essentially separated into **two major program areas:** 1. Services that assist lowans with disabilities to become employed in the competitive labor market or to live independently in their homes through provision of various supports. 2. Services involving the evaluation of lowa citizens' disabilities to determine eligibility for economic support via Social Security disability benefits.

IVRS has managed a waiting list of potentially eligible clients seeking vocational rehabilitation services since May, 2002 and for several years thereafter has had to balance the need for VR services against lack of funding to meet all needs identified. IVRS was not able to match all available federal funding for VR services, which impacted IVRS' ability to serve all persons applying for services. This has resulted in IVRS having to manage a waiting list with approximately 1800 individuals on the list through the past year. Individuals with significant disabilities are waiting approximately five months prior to being able to receive vocational rehabilitation services. Individuals with the most significant disabilities are moving directly into services after being determined eligible for services. The progress made in moving individuals directly into service, while not due to additional funding, was instead due to key management decisions in workforce planning and policy revisions along with the ability to replace direct service employees whose positions had been vacated.

The Disability Determination Services bureau has met and exceeded the requirements set out by the Social Security Administration for accuracy and timeliness associated with determinations on disability claims.

This report will provide a brief update on progress toward the IVRS strategic plan goals as well as information on performance of the three identified core functions of the agency:

- Vocational Rehabilitation Services and Independent Living
- Economic Supports
- Agency Resource Management.

Information for the two major program areas named above will be presented using the "**Key Results Template**". These continue to be the most crucial indicators of this agency's success in providing services to its customers.

#### **Agency Overview**

lowa Vocational Rehabilitation Services (IVRS) exists to serve individuals with disabilities under Title II and Title XVI of the federal Social Security Act and Title IV of the Workforce Investment Act. IVRS serves people with disabilities by: 1) providing vocationally related assistance to achieve economic independence; or 2) providing disability determinations that result in appropriate financial benefits per Social Security Administration guidelines. Other services and financial assistance are provided to enable persons with disabilities to maintain independent

functioning as long as possible within their communities and to prevent institutionalization. IVRS is an integral part of the statewide disability community.

The current statements of mission and vision are included below. The Strategic Objectives are identified in the "Results" section of this report.

#### **MISSION**

We provide expert, individualized services to lowans with disabilities to achieve their independence through successful employment and economic support.

#### **CORE FUNCTIONS**

Assist eligible lowans with disabilities in obtaining, maintaining and advancing in employment through rehabilitation services individually designed to disability and employment needs. Provide specialized services to the business community to meet their workforce and workplace needs.

Determine eligibility of Iowans who apply for disability benefits administered by the federal Social Security Administration

#### **VISION**

Vocational Rehabilitation Services Vision: Making a positive difference with every person, one person at a time

Disability Determination Services Bureau Vision: Best Decision, Every Claimant, Every Time

#### Background:

IVRS is the largest division of the Department of Education and functions with considerable autonomy. The division employs almost 370 people in 44 locations throughout the state. Employees work within three Bureaus and a Planning and Development Team. For vocational rehabilitation services, IVRS received \$24.3 million in federal funds and another \$5.1 million in non-federal funds; for disability determination services, IVRS received federal funds totaling approximately \$24.4 million from the Social Security Administration (no state funds).

The majority of staff persons are professionally trained rehabilitation counselors and disability examiners. Almost 98% of the counselors have master's degrees in counseling or a closely related field. IVRS is mandated by its federal funding agency, the Rehabilitation Services Administration, to have qualified rehabilitation counselors – i.e., possession of an appropriate graduate degree. All disability examiners have at least a bachelor's degree or its equivalent. In addition, DDSB has on its payroll 33 professional consultants who are licensed as physicians,

clinical psychologists, or speech pathologists. Most IVRS employees are covered under collective bargaining agreements negotiated with Iowa United Professionals or the American Federation of State, County and Municipal Employees.

All employees of the Planning and Development Team, Administrative Services and Disability Determination Services bureaus work in the Des Moines area. With the exception of a few administrative personnel and the West Central area office, most of the Rehabilitation Services Bureau employees are geographically disbursed outside of Des Moines to cover all 99 counties and every high school in the state. As stewards of the public trust, IVRS maintains an efficient workforce by assigning staff to multiple locations so that every community college, regent's institution, county, high school and most mental health institutes have access to an IVRS staff person.

IVRS continues to collaborate with our partner agencies to improve work effectiveness. This occurs through communication and avoiding duplication of services through co-locating or itinerant offices in the Iowa Workforce Development Centers, community colleges, regent's institutions and through coverage at our mental health institutions.

The Rehabilitation Services Bureau (RSB) has the primary responsibility for the statewide program of quality vocational rehabilitation services to all eligible disabled lowans through direct and purchased services from a network of providers. The focus of the RSB is training to prepare for, obtain, and maintain employment and as such works very closely with the Department of Education and Iowa Workforce Development. The Disability Determination Services Bureau (DDSB) is responsible for determining the eligibility of Iowa residents, who apply for Social Security Disability Insurance (Title II), and Supplemental Security Income (Title XVI) or the Department of Human Services Medicaid programs. DDSB makes the initial determination of eligibility and any subsequent determination of continuing eligibility and handles first-level appeals of unfavorable decisions. The Administrative Services Bureau (ASB) provides fiscal, personnel, information services and administrative support to the other Bureaus.

The Planning and Development Team (PDT) is responsible for planning, program evaluation, and outreach -- including connecting with the National Employment Network and disseminating that information to the RSB concerning national development of business contacts to foster client employment. There has been a deliberate attempt to increase visibility with business and industry and to integrate these services into developing a placement culture for the Rehabilitation Services Bureau Staff. This has included the opportunity to partner with the National Employment Network providing opportunities to better link job candidates with national and state employment opportunities as well as to market the value of lowa businesses to a national audience. (See Business Outreach below for more detailed description)

IVRS customers are individuals with disabilities who need vocational or other assistance to help meet their goals for employment through the RSB or personal independence or who need financial benefits due to their disabilities through the DDSB. Vocational rehabilitation and disability determination programs are eligibility rather than entitlement programs. Applicants must meet federally determined criteria. Customers of both RSB and DDSB may apply on multiple occasions during their lifetime. Customers of the vocational rehabilitation program be they lowans with disabilities or the business community expect and receive professional and accurate career planning information and involvement to achieve workforce planning, placement or personal independence. DDSB claimants require accurate and timely decisions on their claims.

Competitive success is determined at the federal level by performance standards and indicators. In DDSB that translates to timeliness and accuracy of case processing; on the vocational rehabilitation side, success relates to employment outcomes and equal access to services.

#### **Strategic Challenges**

IVRS was not able to match \$5.26 million of available federal funds for 2013. The lack of funds resulted in 1,079 applicants for vocational rehabilitation services remaining on waiting lists at the end of the year as well as a lack of capacity to expand occupational skill training programs to better meet the needs of our business customers.

IVRS is federally (78.7%) and state (21.3%) funded, so, the multiplying effect of losing one state dollar due to budget cuts adversely impacts the delivery of rehabilitation services. Caseload size for counselors is increasing, and management continues to evaluate each position that is vacated to ensure that the core functions needed result in the proper classification hired. RSB purchases supported employment services through community providers for the most significantly disabled due to the long term job coaching needs, which creates a challenge as more and more providers have decided to withdraw this service as an option due to reduced funding. Individuals are placed on the waiting list because of the budget impact, and the lack of staff capacity to serve the number of individuals requesting services. This has been a continual focus of Employment First efforts with goals relating to improved employment outcomes in competitive, integrated community settings and an alignment of resources between state departments supporting financial funding that encourages community, integrated employment.

Training for job candidates continues to be a priority area as education provides necessary academic and vocational skills to help our clients compete in the labor market. 96% of our graduating students remain in the state of lowa and 70% of our successful employment outcomes have some type of post-secondary education. There is also a close partnership with our secondary schools as we work with our youth in transition. Approximately 42% of our referrals are from our secondary schools. These efforts are closely aligned with the employment strategies outlined in the Skilled Iowa Initiative.

IVRS continues to enhance technology (web-based software) to provide staff with a more efficient system to manage their work. This is an expanding area requiring cost effective solutions to meet the needs of field staff and our job candidates in a mobile society. Issues related to connectivity, security, and access will continue to be reviewed.

IVRS has also attempted to collaborate with our community rehabilitation programs and county waiver programs in an effort to provide supported employment services in network with other comparable benefits and services. This is relatively a small portion of our customers, representing approximately 2%.

Funds for Independent Living case services continue to decrease. As a result there is a growing waiting list approaching two years for the program. With the departure of the Independent Living Specialist in October 2012, the IL caseload was assigned to an employee who handles IL contracts and staff development. The time dedicated to State Independent Living Service Program will be limited to 20% of the program manager. Therefore, we expect the number of clients served will decrease in 2014. Extensive contract monitoring procedures have been necessary in the past year to ensure that contracting requirements are satisfied; IVRS continues to work with State Auditor's office and Office of Attorney General along with our federal compliance partners with the Rehabilitation Services Administration to ensure compliance, particularly after audits revealed significant issues with two of the Centers for Independent Living.

While there are no direct competitors for Disability Determination Services, there is competition for funding with other Social Security Administration entities and other states.

#### **Business Outreach**

<u>The IVRS Business Network:</u> During 2013 IVRS continued to infuse business outreach activities into local and state plans resulting in strengthened business relationships statewide.

These relationships enhance the counselors' understanding of business expectations and are directly connected to the planning process with consumers. It has been found by increasing employer involvement throughout the rehabilitation process, job candidates will have better information to make informed choice decisions on their career plans. An additional result is a broader range of employment opportunities available.

Iowa Vocational Rehabilitation is committed to serving business and industry as a valued customer and in 2013 demonstrated this commitment through the following activities:

- The IVRS strategic plan highlights the importance of understanding the changing workforce needs of lowa business and industry and dedicates resources for developing IVRS' capacity to respond to those needs.
- Rehabilitation Services management participate on each Regional Workforce Investment Board in the State of Iowa. The Administrator is an active participant on the State Workforce Board.
- Development of internships and on-the-job training opportunities has resulted in successful placements in various industries across the state.
- lowa was chosen as a pilot site for Walgreens' new Retail Employees with Disabilities Initiative (REDI). IVRS has partnered
  with Community Rehabilitation Programs in 5 sites to roll-out this 120 hour in-store training program to help job-ready
  candidates become competent in retail and customer service skills essential for competitive employment.
- IVRS and Manpower are collaborating in an effort to provide a workforce solution to lowa business and industry interested in tapping into the underutilized talent pool of persons with disabilities. In 2013 IVRS has successfully placed 17 individuals in temp or temp-to-hire positions.
- IVRS continues to coordinate the activities of the Employer Disability Resource Network (EDRN), <u>www.EDRNetwork.org</u>. With the support of the EDRN partners private and public rehabilitation professionals are collaboratively mobilizing resources, supports and services that add value to lowa businesses hiring persons with disabilities.
- IVRS continues to be an active participant in the national and regional network (The NET) of 80 public VR agencies across
  the country. The NET membership allows for participation in online trainings, sharing of multi-state job leads and keeping upto-date on federal employment opportunities.

- Active involvement through the National Governor's Association presenting information at three business panels regarding business strategies in Iowa.
- The support of Project Search, an immersive school to work transition program providing direct exposure to the world of work.
- Continued efforts are being made to increase capacity for service delivery through our community rehabilitation partners.
   \$1.383 million was spent with our community partners in 2013. The amount of referrals from IVRS to our community providers increased to 794 from 673.

#### Results

#### **Strategic Plan:**

The IVRS strategic plan was revised in October 2011 and projected four major objectives to attain in the subsequent three (3) years; the objectives are listed below.

- 1. Develop and deliver customer service that addresses customer needs and requirements.
- 2. Develop a workforce that identifies and responds to changing workforce and work place needs.
- 3. Build external collaborative relationships which contribute to improved services for lowans with disabilities.
- 4. Establish/maintain financial Accountability/Sustainability resulting in increased service outcomes for individuals with disabilities.

#### **Progress toward Strategic Plan objectives:**

Several staff continues to be involved in implementing actions intended to accomplish the stated objectives. Bureau Chiefs have continued regular meetings with the Administrator regarding the strategic plan and are accountable for supporting staff and activities within each one's bureau that contribute to accomplishment of the objectives.

The DDSB has made progress on the FY11-14 IVRS Strategic Plan goals by realigning existing human resources, harnessing existing technology and focusing on employee retention through development programs.

On site meetings were held with all staff in 2013 discussing the strategic plan and how it is integrated into daily activities. Feedback was solicited from staff in multiple areas regarding how we can become better, faster and smarter with limited resources. This feedback is being reviewed and will help identify targeted areas for change in 2014.

#### **Performance Plan Results**

See enclosed templates for Key Results and Agency Performance Plan Results.

#### **Resource Reallocations**

Resource reallocations in IVRS relate primarily to human resources as management continues to review and adopt the most effective staffing in relation to rehabilitation service delivery. The agency operates at a level that meets the current State standard for span of control – approximately 1:15 ratio of supervisor to employees. Instead of automatically filling vacant Rehabilitation Counselor jobs in the Rehabilitation Services Bureau, staffing patterns have been adopted which provide alternatives to more traditional staffing without diminishing the professional level of service required for IVRS clients.

We have continued to combine management positions wherever feasible. When geographic and other conditions have permitted, we combined area offices under one supervisor rather than maintain a supervisor for each major location as well as not replacing several management level positions when we can effectively determine delegation of existing resources. This has created changes and additional job responsibilities for several management staff, but the priority was and remains how to enhance field service delivery at the job candidate direct service level. This will continue to be the structure in place for the foreseeable future.

Prior to October, 2010, DDSB was able to add some positions funded entirely by Social Security Administration to address the increasing disability claims workload that has become prevalent throughout the country. Since October, 2010, however, there has been a federal hiring freeze initiated by the Social Security Administration which means that most DDSB vacant positions have been left unfilled. The DDSB has seen attrition of 5.7% since October 2010. The DDSB was able to hire one clerical support due to dire need in that area. DDSB was allotted one fiscal and support supervisor hire, which a current staff member filled. This is a new position created because of increased budget oversight requirements by SSA.

#### **KEY RESULTS 1 of 2**

#### **CORE FUNCTION**

Name: Vocational Rehabilitation Services and Independent Living

**Description:** Iowa Vocational Rehabilitation Services (IVRS) provides a wide variety of services for persons with disabilities that lead to the attainment of their employment, independence and economic goals. Business and industry is also a customer of IVRS to whom various services are provided to help them meet their workplace and workforce needs. The desired outcome is competitive employment in the integrated labor market that meets the needs and interests of our eligible client. Services include: assessment, diagnosis and treatment of physical and mental impairments, training, personal assistance services, placement, rehabilitation technology services, maintenance, transportation, small business enterprise assistance, and post-employment services.

Why we are doing this: Federal law was enacted after recognizing that individuals with disabilities faced severe discrimination in the workforce and required specialized assistance to achieve equal opportunity under the law. IVRS provides services to help persons with disabilities find and maintain employment or to help them live independently (not in a group home or other care facility). This greatly enhances their quality of life and adds to the lowa economy through reduced dependence on public support and through the payment of taxes. Our work is consistent with the Governor's stated priorities of 200,000 new jobs in lowa, 15% Reduction in the Cost of Government, 25% Increase in Family Incomes, Best Schools in the Nation.

What we're doing to achieve results: The Rehabilitation Act and regulations require that IVRS hires master's degreed staff as counselors; those who may not have such degree must complete it within five (5) years. IVRS staff includes master's degreed rehabilitation counselors who are strategically located throughout the state. Through workforce planning IVRS created job classifications at a lower pay grade to remove required work from the counseling position that was not part of their core function, but necessary for Federal accountability. This resulted in a reduction in staffing costs such that fewer counselors were hired and replaced by associates and assistants when positions were vacated. This allowed IVRS to utilize the resources more efficiently and still perform all the federally required functions.

IVRS partners with nearly 100 organizations to provide comprehensive rehabilitation services. The lowa Rehabilitation Services System (IRSS) is being closely managed and reviewed for its operating efficiency. This plays an important role in data collection, state and federal reporting and case management.

IVRS has a federal mandate to serve the most significantly disabled individuals first when resources are limited. The focus upon vocational placement and the action planning done in each area office contributed to the number of individuals placed into competitive employment. Through the expertise of the counseling staff, collaboration with clients and other services and resources, IVRS has been increasing the number of clients placed in competitive employment. Every employed client becomes a tax payer and a consumer thereby

increasing lowa's economy and tax base while also saving the State's support dollars. IVRS has demonstrated for every state dollar appropriated to IVRS, \$3.2 is returned to the state economy.

IVRS has met or exceeded the Federal quantity and quality performance measures in all areas except for access to services ratio of minority versus non-minority clients.

**Data Sources**: Case Service Records.

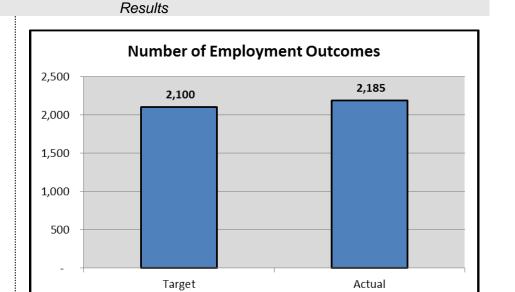
**Resources Used**: IVRS is funded with a combination of 78.7% federal funds and matched with 21.3% non-federal funds required to generate the federal funding. State appropriation for FY 13 was \$4.9+ million. Total of 229.42 FTEs involved (out of authorized 242.0).

# Performance Measure:

Outcomes

**Number of Employment** 

Performance Target: **2100** 



Strategic Plan - Increase successful closures by 10%

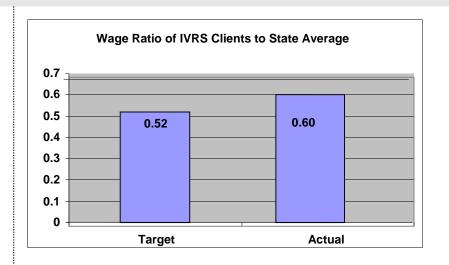
**What was achieved**: IVRS placed **2185** clients into competitive employment, which was a 1% increase. This exceeded our federal standard, but fell short of our strategic plan goal.

#### Results

Performance Measure:

## Wage ratio of IVRS clients to state average

Performance Target: **0.52** 



**What was achieved**: IVRS exceeded the target by placing clients in positions paying an hourly rate of 60% of the average state hourly wage rate.

During FY 13 the average hourly earnings for a person with a disability placed into competitive employment by IVRS was \$11.61.

#### **KEY RESULTS 2 of 2**

#### **CORE FUNCTION**

Name: Disability Determination Services - Economic Supports

**Description:** The IVRS provides disability determination services to claimants for Social Security Disability Insurance and Supplemental Security Income in Iowa through a relationship with the Social Security Administration (SSA) – per federal regulations.

Why we are doing this: To enhance economic independence for disabled lowans through cash benefits and healthier lowans through access to Medicare and Medicaid.

What we're doing to achieve results: The IVRS has successfully implemented a paperless process to determine claimant eligibility for social security benefits and the new system is operating effectively. Continuing business process reviews and targeted quality reviews occur to ensure efficient and accurate service. The DDS performs continuous business process reviews to enhance service and evaluate stewardship. Technology advancements are ongoing with recent automation of intake and closure processes. The DDS teams with state health providers on electronic health records submission. Targeted quality reviews occur to ensure efficient and accurate service.

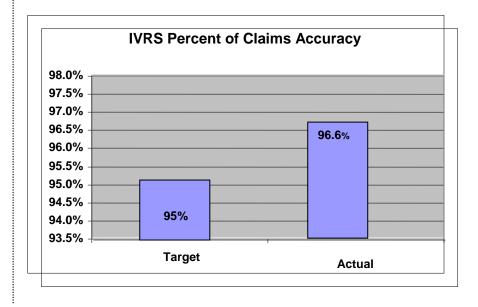
Data Sources: Social Security Administration Office of Quality Assurance and Performance Assessment

**Resources Used**: This program receives 100% federal funding of approximately \$24.4 million from the Social Security Administration. Total of 137.23 FTEs involved (out of authorized 145.86).

Results

Performance Measure:
Percent of claims
accurately determined per
SSA standards

Performance Target: **95%** 



What was achieved: IVRS exceeded the goal of 95% with 96.6% accuracy rate.

## **AGENCY CONTACTS**

- David Mitchell, IVRS Administrator
- Matt Coulter, Chief, Administrative Services Bureau & Financial Officer
- Jeff Haight, Data Specialist

#### **AGENCY PERFORMANCE PLAN**

#### FY 2013

(Numbers in red indicate actual result)

| Name of Agency: Department of Education, Iowa Vocational Rehabilitation Services |  |  |
|--|--|--|
|  |  |  |

Agency Mission: To work for and with individuals with disabilities to achieve their employment, independence and economic goals.

| Core Function  | Performance Measure (Outcome)   | Performance Target(s)                               | Link to Strategic Plan Goal(s)  |
|--|---|---|---|
| CF: Vocational<br>Rehabilitation Services and<br>Independent Living<br>Desired Outcome(s):   | Wage ratio of IVRS clients to state average   | 0.52 .60  | Goal 1 To maximize every client's opportunity to reach their economic, independence and employment goals.   |
| Full-time, or if appropriate, part-time competitive employment in the integrated labor market.   |   |   | Goal 2 Increase advocacy and support for rights of individuals with disabilities.   |
| Services, Products,<br>Activities  | Performance Measures  | Performance Target(s)                               | `Strategies/Recommended Actions   |
| 1. Employment<br>(Vocational Rehabilitation)<br>Org#<br>0001-283-1000<br>0001-283-2000<br>0034-283-0704<br>0366-283-0708<br>0395-283-0703<br>0398-283-0093 | A. Percent employed (federal reporting) B. Access to services ratio of minority to non-minority clients (federal reporting) C. Number of employment outcomes (federal reporting) D. Number of Self Employment clients who achieve start-up or expansion of a business | A. 55.8% 62.27  B. 0.80 .71  C. 2100 2185  D. 45 54 | <ol> <li>High quality client services and outcomes</li> <li>Comprehensive system of job placement</li> <li>Effective collaboration</li> <li>Manage waiting lists for services</li> </ol>  |
| 2. Independent Living<br>(Vocational Rehabilitation)<br>Org#<br>0001-283-0714  | A. Percentage of persons meeting their goals  B. Number of persons able to continue to live independently in their homes  | A. 55% 54%  B. 100 55*                              | High quality client services and outcomes     Effective collaboration     Enhanced external communication  *Funding dedicated to Independent Living services continues to decrease. There is an increased demand for contract monitoring of external program providers. Also, average expenditure per |

|  | client case is significantly higher. These factors, along with limited program funds, have affected the number of successful closures. |
|--|--|
|  |  |

Name of Agency: Department of Education, Iowa Vocational Rehabilitation Services

Agency Mission: To work for and with individuals with disabilities to achieve their employment, independence and economic goals.

| Core Function   | Performance Measure (Outcome)   | Performance Target(s)           | Link to Strategic Plan Goal(s)  |
|---|---|---------------------------------|---|
| CF: Economic Supports   | Percent of claims<br>accurately determined per<br>SSA standards (initial net<br>accuracy) | 95% 96.6 %                      | Goal 1 To maximize every client's opportunity to reach their economic, independence and employment goals. |
| Desired Outcome(s):   |   |                                 |   |
| Economic independence<br>for disabled Iowans<br>through cash benefits, and<br>healthier Iowans through<br>access to Medicare and<br>Medicaid.   |   |                                 |   |
| Services, Products, Activities  | Performance Measures  | Performance Target(s)           | `Strategies/Recommended Actions   |
| 3. Disability Determination: Initial review of claims and continuing disability reviews (CDR) (Economic Supports Org# 0231-283-0716 0394-283-0702 0394-283-0712 0394-283-0722 0394-283-0723 | A. Initial claim processing time B. Percent of budgeted CDRs completed                    | A. 85 days 76.6  B. 100% 102.3% | Develop quality management plan     Enhance training where needs are identified                           |

Name of Agency: Department of Education, Iowa Vocational Rehabilitation Services

Agency Mission: To work for and with individuals with disabilities to achieve their employment, independence and economic goals.

| Core Function   | Performance Measure<br>(Outcome)  | Performance Target(s)  | Link to Strategic Plan Goal(s)  |
|---|---|--|---|
| CF: Agency Resource<br>Management   | <ol> <li>Percent of internal customer satisfaction with key support services</li> <li>Percent of time IT network services are available to staff</li> </ol>                   | 1. 85% 88% 2. 95% 99%  | Goal 3 Increase capacity to serve all VR clients. Goal 4 Increase interest and satisfaction in VR careers.  |
| Desired Outcome(s):  Resources are sufficient to provide services per IVRS mission and federal guidelines for Vocational Rehabilitation and |   |  |   |
| Disability Determination.  Services, Products,  Activities  | Performance Measures  | Performance Target(s)  | `Strategies/Recommended Actions   |
| 4.Infrastructure (Resource Management) Org# 0001-283-3000 0001-283-4000   | <ul> <li>A. Percent of required non-federal match dollars generated</li> <li>B. Ratio of employees to supervisors</li> <li>C. Inspection results – Parker Building</li> </ul> | A. 100% 79.9%  B. 12:1 15:1  C. DAS responsibility now as "owner" of the Parker Building | <ol> <li>Maintain and improve sustainability model and use IRSS to forecast resource needs</li> <li>Not fill supervisory positions automatically when vacancies arise.</li> <li>Maintain contact with DAS regarding maintenance operations in Parker Building.</li> </ol> |